

Kimberly M. Frayer, RN, BS, HHC
Owner; Aurora Wellness Solutions

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Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter to express my strong opposition to the proposed Business Opportunity Rule R511993. Running a Shaklee business is not an "unfair and deceptive act or practices", but the rule as proposed would make it MORE difficult for me to operate my business as a Shaklee Independent Distributor.

A seven-day waiting period to enroll new distributors just doesn't work. That is to make purchases at a discounted price. If they later wish to build a business, all they must do is supply Shaklee Corporation with their Social Security Number or Tax Identification Number. There is no additional kit, fee or application required.

Are you applying this process to junk sold on TV???

The proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. If you shared any of my personal information- name, address, age, items purchase with a stranger, don't you think that is an invasion of my privacy??? In this day of identity theft, I am uncomfortable giving out the personal information to strangers. If those signing up after the rule takes effect are told in writing "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." I believe that this would dissuade new people from signing up as distributors as they are concerned not only about identity theft, but also about their privacy. People today are understandably reluctant to share their personal information with individuals they may never have met.

The ten reference requirement also is an administrative burden. In order to obtain the list of 10 prior purchasers, I will need to provide Shaklee Corporation with the prospective distributor's address, and then wait to receive the list of the 10 nearest distributors who became distributors within the past three years. Each prospective recruit will need a customized disclosure statement. This will result in a delay far longer than seven calendar days before any potential recruit can sign an application.

The proposed rule calls for the release of any information regarding lawsuits that allege misrepresentation or unfair or deceptive practices over a ten-year period. It does not matter if the company was found innocent or not liable. Today, almost all business lawsuits contain claims of misrepresentation or unfair competition. It does not make sense to me that I would have to disclose these lawsuits unless Shaklee Corporation, or its officers, directors or sales department employees, had been found guilty or liable. Otherwise, fifty-year old companies such as Shaklee Corporation and their distributors would be placed at a disadvantage compared to start-up direct selling companies, which may not yet have experienced litigation but which are far more likely to have legal issues surrounding their opportunities.

I have been a Shaklee Distributor for about 1-2 years. Originally, I became a Shaklee Distributor because I love the Company's nutritional/personal care/household products and their green manufacturing

processes. I wanted to earn some additional income working from home and find building my business slow- adding this extra paperwork burden would strongly encourage me to stop.

While I appreciate the work of the FTC to protect consumers, I believe this proposed new rule has many unintended consequences for direct sellers and that there are less burdensome alternatives available to the agency to achieve its goals.

Thank you for your time in considering my comments.

Sincerely,
Kimberly Frayer, RN

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Aurora Wellness Solutions; Holistic Wellness Coaching and Education.